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CASE UNSEALED PER ORDER OF COURT

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

December 2012 Grand Jury

UNITED STATES OF AMERICA, Plaintiff, v. ARTHUR GRIGORIAN (1), aka Artur, aka Kor, aka Mo, aka Ponch, aka Ponchik, aka Chagh, ERNEST SOLOIAN (2), aka Erik, HOVHANNES HARUTYUNYAN (3), aka Hovo, aka Oz, aka Anaconda, aka Snake, aka Cobra, HAROUT GEVORGYAN (4), aka Noro, STANSILAV MELNIKOV (5), aka Stas, YVONNE MIHAILESCU (6), aka Blondie, SUKHROB MUSAYEV (7), aka Suxrob, RENAT TALANOV (8), ILYAS ABDRAKHAY (9), NURBEK AKHMADIYEV (10), INDIRA AKHMETOVA (11),	Case No.: 13CR3479BTM I N D I C T M E N T Title 18, U.S.C., Sec. 371 – Conspiracy; Title 18, U.S.C., Sec. 1341 – Mail Fraud; Title 18, U.S.C., Sec. 1343 – Wire Fraud; Title 18, U.S.C., Sec. 1956(a)(1)(B)(i) – Money Laundering; Title 18, U.S.C., Sec. 1028A – Aggravated Identity Theft; Title 18, U.S.C., Secs. 981(a)(1)(A), 981(a)(1)(C), 982(a)(1), and Title 28, U.S.C., Sec. 2461(c) – Criminal Forfeiture

PMJ:nlv:San Diego:9/19/2013

MERUYERT AKHMETOVA (12),
aka Mira,
aka Tall One,
SAGIT BATCHAEV (13),
aka Chechen,
KSENIA CHABANOVA (14),
YERMEK DOSSYMBEKOV (15),
KONSTANTIN IVANOV (16),
YEVGENIY IVANOV (17),
VYACHESLAV LAZAREV (18),
KURBAN MAGALIYEV (19),
PATIMAT MAGALIYEV (20),
aka Fatima,
ALISHER OMAROV (21),
aka Aisher,
MADLEN OSPANOVA (22),
KARINA POLOZOVA (23),
ZHASSULAN SHILIKBAY (24),
aka Jasik,
aka Tall One,
YELENA SKLYAROVA (25),
YEVGENIY SOTNIKOV (26),
VYACHESLAV TSOY (27),
aka Kachal,
aka Slava,
ULAN ZAKIROV (28),
TAIYR ZHURYN (29),

Defendants.

The Grand Jury charges:

INTRODUCTION

A. **Definitions**

1. Personal identity information ("PII") means any name, address, date of birth, Social Security number, access code, access device or account number, driver's license number, personal identification number ("PIN"), telephone number, signature, and other means of identification.

2. "Identity theft victim" means any real person whose PII was obtained and used by others without lawful authority.

3. The Internal Revenue Service ("IRS") is an agency of the United States Department of the Treasury ("Treasury") responsible for enforcing and administering the tax laws of the United States. The IRS allows taxpayers to file their U.S. Individual Income Tax Returns (Forms 1040) ("tax returns") electronically ("e-file") directly or

through a tax preparation business, like TurboTax. The IRS issues tax refunds either: (a) in the form of Treasury checks via the United States Postal Service; or (b) by direct deposit to bank accounts or debit cards designated on a tax return.

4. "Intuit" is the parent company of TurboTax, a Web-based tax preparation business. Intuit maintained a server in San Diego and electronically routed e-filed tax returns through this server before ultimately sending the returns to the IRS for filing.

5. The Green Dot Corporation ("Green Dot") issues prepaid MasterCard and Visa debit cards ("Green Dot cards") in the United States that may be obtained online or purchased at more than 60,000 retail stores. A Green Dot card user can add money to the card by paying cash at a retail store's point of sale, transferring funds from their bank accounts, or directly depositing funds, including tax refunds. The IRS and Web-based services like TurboTax permit taxpayers to elect to have a tax refund directly deposited to accounts associated with prepaid debit cards, such as a Green Dot card.

6. Mobile broadband cards, also known as wireless air cards ("wireless air cards"), are small mobile devices typically inserted into the USB port of a computer to connect to the Web using the wireless cellular networks of phone providers. Because wireless air cards utilize cellular networks, they allow users to access the Web without the need for a Wi-Fi connection. These devices can be purchased online or at various retail stores. To use a wireless air card, the user typically obtains either a data plan with a wireless cellular network provider, or prepaid or short-term plans that can be purchased online and at many retail stores.

7. "J1" means a foreign national who holds a J1 visa. A "J1 visa" is a non-immigrant, short-term cultural exchange visa issued by the United States Department of State that allows foreign nationals to come to the United States for a short period of time (generally three months) to study, work, or travel. In order to obtain a J1 visa, the foreign national must have a United States sponsor and, in most instances, a pending job offer.

8. "F1" means a foreign national who holds an F1 visa. An "F1 visa" is a non-immigrant, short-term student visa that allows foreign nationals to come to the United

States for a period of time (generally 18 months with the possibility of an extension), for full-time academic study. F1 visa holders must maintain a full course of study while in the United States and demonstrate that they can support themselves.

B. Defendants

9. Defendants ARTHUR GRIGORIAN (1), aka Artur, aka Kor, aka Mo, aka Ponch, aka Ponchik, aka Chagh, ERNEST SOLOIAN (2), aka Erik, and HOVHANNES HARUTYUNYAN (3), aka Hovo, aka Oz, aka Anaconda, aka Snake, aka Cobra, among other things, organized and led a conspiracy that used stolen PII of identity theft victims to file fraudulent tax returns, receive fraudulent tax refunds, and launder the proceeds.

10. Defendant HAROUT GEVORGYAN (4), aka Noro, participated in the conspiracy by, among other things, recruiting and supervising other defendants and coconspirators, and possessing and distributing PII of identity theft victims to further the conspiracy.

11. Defendants STANISLAV MELNIKOV (5), aka Stas, SUKHROB MUSAYEV (7), aka Suxrob, and RENAT TALANOV (8) participated in the conspiracy by, among other things, recruiting and supervising other coconspirators to further the conspiracy.

12. Defendant YVONNE MIHAILESCU (6), aka Blondie, participated in the conspiracy by, among other things, using her position as an employee of Wells Fargo Bank ("WFB") to open bank accounts to further the conspiracy.

13. Defendants ILYAS ABDRAKHAY (9), NURBEK AKHMADIYEV (10), INDIRA AKHMETOVA (11), MERUYERT AKHMETOVA (12), aka Mira, aka Tall One, SAGIT BATCHAEV (13), aka Chechen, KSENIA CHABANOVA (14), YERMEK DOSSYMBEKOV (15), KONSTANTIN IVANOV (16), YEVGENIY IVANOV (17), VYACHESLAV LAZAREV (18), KURBAN MAGALIYEV (19), PATIMAT MAGALIYEV (20), aka Fatima, ALISHER OMAROV (21), aka Aisher, MADLEN OSPANOVA (22), KARINA POLOZOVA (23), ZHASSULAN SHILIKBAY (24), aka Jasik, aka Tall One, YELENA SKLYAROVA (25), YEVGENIY SOTNIKOV (26),

VYACHESLAV TSOY (27), aka Kachal, aka Slava, ULAN ZAKIROV (28), and TAIYR ZHURYN (29), all J1s or F1s, participated in the conspiracy by, among other things, recruiting other coconspirators, receiving mail, opening bank accounts, and conducting bank transactions to further the conspiracy.

Count 1

CONSPIRACY

(18 U.S.C. § 371)

14. The Grand Jury hereby realleges, and incorporates by reference paragraphs 1 through 13 of this Indictment as if fully set forth herein.

15. Beginning on a date unknown to the Grand Jury, but as early as in or about March 2011, and continuing through at least November 2012, within the Southern District of California, and elsewhere, defendants ARTHUR GRIGORIAN (1), aka Artur, aka Kor, aka Mo, aka Ponch, aka Ponchik, aka Chagh, ERNEST SOLOIAN (2), aka Erik, and HOVHANNES HARUTYUNYAN (3), aka Hovo, aka Oz, aka Anaconda, aka Snake, aka Cobra, HAROUT GEVORGYAN (4), aka Noro, STANISLAV MELNIKOV (5), aka Stas, YVONNE MIHAILESCU (6), aka Blondie, SUKHROB MUSAYEV (7), aka Suxrob, RENAT TALANOV (8), ILYAS ABDRAKHAY (9), NURBEK AKHMADIYEV (10), INDIRA AKHMETOVA (11), MERUYERT AKHMETOVA (12), aka Mira, aka Tall One, SAGIT BATCHAEV (13), aka Chechen, KSENIA CHABANOVA (14), YERMEK DOSSYMBEKOV (15), KONSTANTIN IVANOV (16), YEVGENIY IVANOV (17), VYACHESLAV LAZAREV (18), KURBAN MAGALIYEV (19), PATIMAT MAGALIYEV (20), aka Fatima, ALISHER OMAROV (21), aka Aisher, MADLEN OSPANOVA (22), KARINA POLOZOVA (23), ZHASSULAN SHILIKBAY (24), aka Jasik, aka Tall One, YELENA SKLYAROVA (25), YEVGENIY SOTNIKOV (26), VYACHESLAV TSOY (27), aka Kachal, aka Slava, ULAN ZAKIROV (28), and TAIYR ZHURYN (29), did knowingly and intentionally conspire and agree with each other and others, to commit the following offenses against the United States:

a. Mail fraud, in violation of Title 18, United States Code, Section 1341;

b. Wire fraud, in violation of Title 18, United States Code, Section 1343; and

c. Money laundering, in violation of Title 18, United States Code, Section 1956(a)(1).

A. Manner and Means of the Conspiracy

16. The defendants and their coconspirators, both known and unknown to the Grand Jury (the "coconspirators"), used the following manner and means to carry out the objects of the conspiracy:

17. The coconspirators unlawfully obtained the PII of identity theft victims in order to file fraudulent tax returns in their names and Social Security numbers. The coconspirators valued "clean" stolen identities; that is, identities of individuals who were unlikely to file legitimate tax returns.

18. The coconspirators unlawfully submitted fraudulent tax returns to the IRS using the stolen PII of identity theft victims, including their names and Social Security numbers, for the purpose of obtaining fraudulent tax refunds. The coconspirators filed the fraudulent tax returns through the mail or electronically, either directly with the IRS or through a Web-based service, like TurboTax. Many returns e-filed through TurboTax were routed through Intuit's server in San Diego, California, before ultimately being sent to the IRS for filing.

19. The coconspirators used wireless air cards to e-file fraudulent tax returns, thereby making it difficult for law enforcement to determine the location or Internet Protocol address ("IP address") used to file a given fraudulent tax return. Further, the wireless air cards allowed the coconspirators to e-file fraudulent tax returns from any location with cellular coverage, without the need to be in a public Wi-Fi hot-spot.

20. The coconspirators caused the IRS to pay certain fraudulent tax refunds through Treasury checks that were mailed, via the United States Postal Service, to addresses listed on the tax returns and controlled by the conspirators. The coconspirators

used J1/F1s coconspirators to rent apartments and Post Office boxes in order to receive the fraudulently obtained Treasury checks and other correspondence from the IRS.

21. The coconspirators obtained the unlawful proceeds of the mailed, fraudulent tax refunds by having J1/F1s coconspirators and others retrieve and deliver to other coconspirators the Treasury checks. The coconspirators compensated the J1/F1 coconspirators and others for such activity.

22. The coconspirators obtained prepaid debit cards, including Green Dot cards, in the names of unsuspecting identity theft victims. The coconspirators then requested that the IRS directly deposit, via interstate wires, fraudulently obtained tax refunds to such cards (through linked direct deposit accounts) to help conceal the nature, location, source, ownership, and control of the unlawfully obtained tax refunds.

23. The coconspirators opened bank accounts at a variety of banks, including Wells Fargo Bank ("WFB"), Bank of America ("BoA"), Citibank, and U.S. Bank. The coconspirators then requested that the IRS directly deposit, via interstate wires, fraudulently obtained tax refunds to these accounts.

24. The coconspirators opened these bank accounts in the names of identity theft victims, J1/F1 coconspirators (who were compensated for this activity), and fictitious businesses, and utilized bank accounts of former J1/F1s who sold their account information to the coconspirators and others before leaving the United States. The coconspirators utilized these nominees in order to help conceal the nature, location, source, ownership, and control of the unlawfully obtained tax refunds.

25. The coconspirators obtained the unlawful proceeds of the directly deposited fraudulent tax refunds by having J1/F1 coconspirators and others withdraw cash from a recipient account or from a secondary account, and obtain cashier's checks and money orders.

26. The coconspirators utilized the bank accounts and other methods to launder the proceeds of the fraudulent tax refunds, including by: (a) transferring funds between accounts, including accounts held in different names and at different banks; (b)

withdrawing cash from the accounts; (c) purchasing cashier's checks and money orders; (d) cashing Treasury checks and cashier's checks; and (e) delivering and receiving cash.

27. The coconspirators possessed, shared, and used lists of stolen PII of identity theft victims, Green Dot cards, bank account debit and ATM cards, and other banking documents, all in furtherance of the conspiracy.

28. The coconspirators communicated information relevant to obtaining fraudulent tax refunds through a variety of means designed to conceal their criminal activity and frustrate law enforcement, including: (a) using coded and ambiguous language to refer to various aspects of the conspiracy; (b) avoiding the use of their real names and instead referring to each other by nicknames; (c) using prepaid cell phones (also known as "drop phones") which they changed on a regular basis; (d) meeting in crowded public places and in locations that provided them vantage points from which to conduct counter-surveillance (e.g., at the end of cul-de-sacs); (e) prohibiting phones from being carried during certain meetings; and (f) using shared email accounts. Through this latter technique the coconspirators created a Web-based email account and shared the account login and password information with each other in order to set up a private method of communication.

29. The coconspirators conducted other aspects of their activities and transactions in a manner designed to conceal their criminal activity and frustrate law enforcement, including: (a) conspiring with J1/F1 short-term visa holders who were scheduled to be in the United States only for a limited period of time; (b) e-filing fraudulent tax returns using Web-based services like Turbo Tax by using the names of identity theft victims; and (c) leasing or renting cars, often in the names of others, and using paper dealership license plates.

30. Certain coconspirators committed, attempted, and threatened to commit acts of violence, and promoted a climate of fear through violence and threats of violence, to further the goals of the conspiracy and to ensure that coconspirators and others did not inform law enforcement authorities regarding the conspiracy.

31. The coconspirators filed and caused to be filed more than 2,000 fraudulent tax returns for tax years 2010 and 2011, claiming tax refunds totaling over $17,000,000.

B. Overt Acts

32. In furtherance of the conspiracy and to accomplish the objects thereof, the coconspirators committed the following overt acts, among others, within the Southern District of California and elsewhere, on or about the dates set forth below:

Establishment of Shared Email Accounts

33. In April 2011, defendant GRIGORIAN (1) established the email account jenniferlpz09@gmail.com ("the Gmail account") for shared use by coconspirators and others, in order to communicate through a private method. The information discussed in the Gmail account included the following: (a) the PII of identity theft victims; (b) bank accounts expected to receive fraudulent tax refunds; and (c) addresses expected to receive fraudulently obtained tax refunds and other correspondence.

34. On May 3, 2012, defendant HARUTYUNYAN (3) (established the email account dhdhdh_g@yahoo.com ("the Yahoo! account") for shared use by coconspirators and others, in order to communicate through a private method. The information discussed in the Yahoo! account included the following: (a) the PII of identity theft victims; (b) bank accounts expected to receive fraudulent tax refunds; and (c) addresses expected to receive fraudulently obtained tax refunds and other correspondence.

Lists of Identity Theft Victims' PII and Bank Accounts

Used to Receive Fraudulent Refunds

35. On February 28, 2011, defendant GEVORGYAN (4) provided to a third party the PII (including names, Social Security numbers, and dates of birth) of approximately 14 identity theft victims, including victims with the initials E.A.E. and M.F., in order to alert coconspirators to expected, fraudulent tax refunds.

36. On April 2, 2011, defendant GEVORGYAN (4) disposed of a list containing the PII (including names) of approximately 65 identity theft victims, including victims

with the initials S.A., C.A., and F.M., used to alert coconspirators to expected, fraudulent tax refunds.

37. On May 12, 2011, defendant GRIGORIAN (1) provided to a third party the PII (including names and Social Security numbers) of approximately 17 identity theft victims, including victims with the initials S.R., J.S., M.Q., C.D., I.R., and C.R., and S.T., in order to alert coconspirators to expected, fraudulent tax refunds.

38. On May 29, 2011, defendant GRIGORIAN (1) provided to a third party the PII (including names) of approximately five (5) identity theft victims, including a victim with the initials B.R., in order to alert coconspirators to expected, fraudulent tax refunds.

39. In June 2011, defendant GRIGORIAN (1) provided to a third party the PII (including names and Social Security numbers) of approximately 24 identity theft victims, including victims with the initials F.H. and S.B., in order to alert coconspirators to expected, fraudulent tax refunds.

40. On July 5, 2011, defendant GRIGORIAN (1) provided to a third party the PII (including names) of approximately 32 identity theft victims, in order to alert coconspirators to expected, fraudulent tax refunds.

41. In September 2011, defendant HARUTYUNYAN (3) sold to defendant SOLOIAN (2) the PII (including names, Social Security numbers, and dates of birth) of approximately 142 identity theft victims to be used to obtain fraudulent tax refunds in the victims' names.

42. In August or September, 2011, defendant SOLOIAN (2) provided to a third party the PII (including names, Social Security numbers, and dates of birth) of approximately 142 identity theft victims to be used to obtain fraudulent tax refunds in the victims' names, which SOLOIAN (2) had previously purchased from defendant HARUTYUNYAN (3).

43. On March 3, 2012, defendant HARUTYUNYAN (3) gave to defendant SOLOIAN (2) and a third party the PII (including names, Social Security numbers, and

dates of birth) of approximately 50 identity theft victims as samples of stolen identities to be used to obtain fraudulent tax refunds in the victims' names.

44. On March 25, 2012, defendant HARUTYUNYAN provided to defendant SOLOIAN the PII (including names) of approximately 11 identity theft victims for expected tax refunds in the victims' names, in order to alert coconspirators to the expected, fraudulent tax refunds.

45. On March 26, 2012, defendant HARUTYUNYAN (3) sold to a third party the PII (including names, Social Security numbers, and dates of birth) of approximately 100 identity theft victims to be used to obtain fraudulent tax refunds in the victims' names.

46. On March 26, 2012, defendant SOLOIAN (2) provided to a third party lists of approximately 100 identity theft victims that defendant HARUTYUNYAN (3) previously sold to the third party for $3,000.

47. On May 28, 2012, defendant HARUTYUNYAN (3) and others caused information to be posted to the Yahoo! account that provided, in part, the details of defendants K. IVANOV's (16) and OMAROV's (21) bank accounts.

48. On June 5, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused information to be posted to the Yahoo! account that provided, in part, details of the expected tax refunds in the names of identity theft victims with the initials M.J., D.V., M.P., L.L., M.R., and S.T.

49. On June 6, 2012, defendant HARUTYUNYAN (3) caused information to be posted to the Yahoo! account that provided, in part, details of the expected tax refunds in the names of identity theft victims with the initials M.J., D.V., M.P., L.L., M.R., and S.T.

50. On June 6, 2012, defendant SOLOIAN (2) caused a draft email to be posted to the Yahoo! account that provided, in part, the PII (including the name, date of birth, and Social Security number) of identity theft victims with the initials B.O., I.H., L.O., and R.P.

51. On June 6, 2012, defendants SOLOIAN (2) caused information to be posted to the Yahoo! account that provided, in part, the details of defendant K. IVANOV's (16) WFB account ending in -5455.

52. On June 11, 2012, defendant SOLOIAN (2) caused information to be posted to the Yahoo! account that provided, in part, the PII (including the name, date of birth, and Social Security number) of identity theft victims with the initials M.G., M.L. and B.Q.

Use of Mailboxes and Apartments to Receive Fraudulent Tax Refunds and Other Correspondence

53. On May 17, 2011, defendant TALANOV (8) rented an address on University Avenue in San Diego.

54. On May 17, 2011, defendant MELNIKOV (5) rented an address on University Avenue in San Diego.

Use of Bank Accounts to Receive Fraudulent Refunds and Launder Money

55. On June 23, 2011, defendant K. MAGALIYEV (19) caused WFB accounts ending in -2722 and -7324 to be opened, which were used to receive fraudulent tax refunds and to launder the proceeds.

56. On July 8, 2011, defendant POLOZOVA (23) caused WFB accounts ending in -8971 and -0232 to be opened, which were used to receive fraudulent tax refunds and to launder the proceeds.

57. On July 29, 2011, defendant P. MAGALIYEV (20) caused WFB accounts ending in -4040, -4024, and -4032 to be opened, which were used to receive fraudulent tax refunds and to launder the proceeds.

58. On August 19, 2011, defendant SHILIKBAY (24) caused Chase Bank account ending in -9384 to be opened, which was used to launder the proceeds of the fraudulent tax refund.

59. On November 30, 2011, defendant ABDRAKHAY (9) caused U.S. Bank account ending in -3317 to be opened, which was used to receive a fraudulent tax refund.

60. On December 3, 2011, defendant TSOY (27) caused Chase accounts ending in -5091 and -4912 to be opened, which were used to receive fraudulent tax refunds and launder the proceeds.

61. On December 13, 2011, defendant DOSSYMBEKOV (15) caused Citibank accounts ending in -6327 and -6285 to be opened, which were used to receive fraudulent tax refunds.

62. On January 4, 2012, defendant AKHMADIYEV (10) caused Chase Bank accounts ending in -2367 and -0342 to be opened, which were used to receive fraudulent tax refunds and launder the proceeds.

63. On January 4, 2012, defendant OMAROV (21) caused Chase Bank account ending in -2573 to be opened in San Diego, which was used to receive fraudulent tax refunds and launder the proceeds.

64. On January 4, 2012, defendant OMAROV (21) caused WFB account ending in -6313 to be opened, which was used to receive fraudulent tax refunds.

65. On January 10, 2012, defendant OMAROV (21) caused U.S. Bank accounts ending in -9142 and -5844 to be opened in San Diego, which were used to receive fraudulent tax refunds and to launder the proceeds.

66. On April 2, 2012, defendant K. IVANOV (16) caused WFB accounts ending in -5455 and -1011 to be opened in San Diego, which were used to receive fraudulent tax refunds and to launder the proceeds.

Acts Related to Specific Fraudulent Tax Returns and Refunds

S.R. Tax Return

67. On April 12, 2011, defendant GRIGORIAN (1) caused information to be posted to the Gmail account that provided, in part, the details of WFB account ending in -7279.

68. On May 3, 2011, defendant GRIGORIAN (1) caused a 2010 tax return to be filed (after being routed through Intuit's San Diego server) with the IRS in the name of an

identity theft victim with the initials S.R. This return fraudulently claimed a $9,506 tax refund.

69. On May 13, 2011, defendant GRIGORIAN (1) caused the Treasury to wire the fraudulently obtained $9,506 tax refund to the WFB account ending in -7279.

70. On May 15, 2011, defendant GRIGORIAN (1) caused a $9,700 check (no. 153) from the WFB account ending in -7279 to be delivered to defendant M. AKHMETOVA (12), in order to convert the fraudulently obtained refund into cash.

71. On May 16, 2011, defendant M. AKHMETOVA (12) caused the $9,700 check (no. 153) to be deposited into her Chase Bank account ending in -7747.

72. On May 25, 2011, defendant M. AKHMETOVA (12) withdrew $9,000 in cash from her Chase Bank account ending in -7747.

73. On May 26, 2011, defendant GRIGORIAN (1) obtained approximately $9,000 in cash withdrawn by defendant M. AKHMETOVA (12) at a San Diego Shell gas station.

C.G. Tax Return

74. On May 11, 2011, defendants GRIGORIAN (1) and SOLOIAN (2) caused a 2010 tax return to be filed with the IRS in the name of an identity theft victim with the initials C.G. The return fraudulently claimed a $9,211 tax refund.

75. On May 20, 2011, defendants GRIGORIAN (1) and SOLOIAN (2) caused the Treasury to wire the fraudulently obtained $9,211 tax refund to an unindicted coconspirator's Chase Bank account ending in -1068.

76. On May 20, 2011, defendants GRIGORIAN (1) and SOLOIAN (2) caused the fraudulently obtained $9,211 tax refund to be transferred from Chase Bank account ending in -1068 to Chase Bank account ending in -9906, in the name of the same unindicted coconspirator.

77. On May 22, 2011, defendant SOLOIAN (2) caused a $9,200 check (no. 1054) from Chase Bank account ending in -9906 to be delivered to defendant OSPANOVA (22), in order to convert the fraudulently obtained refund into cash.

78. On May 23, 2011, defendant OSPANOVA (22) caused the $9,200 check (no. 1054) to be deposited into her BoA account ending in -8395.

79. On May 25, 2011, defendant OSPANOVA (22) withdrew $5,000 in cash from her BoA account ending in -8395 at a San Diego BoA branch. Defendant OSPANOVA (22) kept $500 as payment for transferring and cashing the fraudulently obtained refund.

80. On May 26, 2011, defendant GRIGORIAN (1) obtained $4,500 in cash withdrawn by defendant OSPANOVA (22) at a San Diego Shell gas station.

J.S. Tax Refund

81. On April 29, 2011, defendant GRIGORIAN (1) caused a 2010 tax return to be filed (after being routed through Intuit's San Diego server) with the IRS in the name of an identity theft victim with the initials J.S. The return fraudulently claimed a $9,397 tax refund.

82. On May 13, 2011, defendant GRIGORIAN (1) caused the Treasury to wire the fraudulently obtained $9,397 tax refund to WFB account ending in -0745.

83. On May 15, 2011, defendant GRIGORIAN (1) caused a $9,850 check (no. 105) from WFB account ending in -0745 to be delivered to defendant M. AKHMETOVA (12), in order to convert the fraudulently obtained refund into cash.

84. On May 16, 2011, defendant M. AKHMETOVA (12) caused the $9,850 check (no. 105) to be deposited into her BoA account ending in -7631.

85. On May 25, 2011, defendant M. AKHMETOVA (12) withdrew $9,000 in cash from her BoA account ending in -7631 at a San Diego BoA branch. Defendant M. AKHMETOVA (12) kept $200 as payment for transferring and cashing the fraudulently obtained refund.

86. On May 26, 2011, defendant GRIGORIAN (1) obtained the $8,800 in cash withdrawn by defendant M. AKHMETOVA (12) at a San Diego Shell gas station.

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M.Q. Tax Return

87. On May 3, 2011, defendant GRIGORIAN (1) caused a 2010 tax return to be filed (after being routed through Intuit's San Diego server) with the IRS in the name of an identity theft victim with the initials M.Q. The return fraudulently claimed a $9,800 tax refund.

88. On May 13, 2011, defendant GRIGORIAN (1) caused the Treasury to wire the fraudulently obtained $9,800 tax refund to an unindicted coconspirator's WFB account ending in -3902.

89. On May 13, 2011, defendant GRIGORIAN (1) caused $9,800 to be transferred from WFB account ending in -3902 to WFB account ending in -8890, a linked account also in the name of the same unindicted coconspirator.

90. On May 15, 2011, defendant GRIGORIAN (1) caused a $9,650 check (no. 105) from WFB account ending in -8890 to be delivered to defendant TALANOV (8), in order to convert the fraudulently obtained refund into cash.

91. On May 16, 2011, defendant TALANOV (8) caused the $9,650 check (no. 105) to be deposited into his Chase Bank account ending in -7457.

92. On May 25, 2011, defendant TALANOV (8) withdrew $8,900 in cash from his Chase Bank account ending in -7457 at a San Diego Chase branch. Defendant TALANOV (8) kept $300 as payment for transferring and cashing the fraudulently obtained refund.

93. On May 26, 2011, defendant GRIGORIAN (1) obtained approximately $8,600 in cash withdrawn by defendant TALANOV (8) at a San Diego Shell gas station.

K.H. Tax Return

94. On May 14, 2011, defendants GRIGORIAN (1) and SOLOIAN (2) caused a 2010 tax return to be filed (after being routed through Intuit's San Diego server) with the IRS in the name of an identity theft victim with the initials K.H. The return fraudulently claimed a total tax refund of $9,751.

95. On May 27, 2011, defendants GRIGORIAN (1) and SOLOIAN (2) caused the Treasury to wire the fraudulently obtained $6,942 tax refund to an unindicted coconspirator's WFB account ending in -8890.

96. On May 27, 2011, defendant GRIGORIAN (1) caused a $7,000 check (no. 106) from WFB account ending in -8890 to be delivered to defendant M. AKHMETOVA (12), in order to convert the fraudulently obtained refund into cash.

97. On May 31, 2011, defendant M. AKHMETOVA (12) caused the $7,000 check (no. 106) to be deposited into her Citibank account ending in -6959.

98. On June 7, 2011, defendant M. AKHMETOVA (12) withdrew $7,000 in cash from her Citibank account ending in -6959 at a San Diego Citibank branch. Defendant M. AKHMETOVA (12) kept approximately $2,000 for the transfer and withdrawal of the fraudulently obtained refund and others.

99. On June 7, 2011, defendant GRIGORIAN (1) obtained a portion of the $7,000 withdrawn by defendant M. AKHMETOVA (12) (the $7,000 withdrawal minus defendant M. AKHMETOVA's payment) at a meeting in San Diego.

A.M. Tax Return

100. On May 11, 2011, defendant GRIGORIAN (1) caused a 2010 tax return to be filed with the IRS in the name of an identity theft victim with the initials A.M. The return fraudulently claimed a tax refund of $8,806.

101. On May 20, 2011, defendant GRIGORIAN (1) caused the Treasury to wire the fraudulently obtained $8,806 tax refund to an unindicted coconspirator's Citibank account ending in -2764.

102. On May 25, 2011, defendant M. AKHMETOVA (12) caused a $4,600 check (no. 104) from Citibank account ending in -2764 to be deposited into her U.S. Bank account ending in -2768.

103. On May 25, 2011, defendant OSPANOVA (22) caused a $6,500 check (no. 105) from Citibank account ending in -2764 to be deposited into her U.S. Bank account ending in -2735.

104. On June 7, 2011, defendant M. AKHMETOVA (12) withdrew $4,600 in cash from her U.S. Bank account ending in -2768 at a San Diego U.S. Bank branch. Defendant M. AKHMETOVA (12) kept approximately $2,000 for the transfer and withdrawal of the fraudulently obtained refund and others.

105. On June 7, 2011, defendant OSPANOVA (22) withdrew $6,400 in cash from her U.S. Bank account ending in -2735. Defendant OSPANOVA (22) kept $600 for the transfer and withdrawal of the fraudulently obtained tax refund.

106. On June 7, 2011, defendant GRIGORIAN (1) obtained a portion of the $11,000 withdrawn by defendants M. AKHMETOVA (12) and OSPANOVA (22) (the $11,000 in total withdrawals minus the payments kept by defendants M. AKHMETOVA and OSPANOVA) at a meeting in San Diego.

F.V. Tax Return

107. On April 21, 2011, defendant GRIGORIAN (1) caused information to be posted to the Gmail account that provided, in part, the details regarding addresses on University Avenue in San Diego.

108. On April 25, 2011, defendant GRIGORIAN (1) caused Green Dot debit card ending in -6716, in the name of an identity theft victim with the initials E.A., which was associated with Green Dot account ending in -3971, to be mailed to an address on University Avenue in San Diego.

109. On May 17, 2011, defendant MELNIKOV (5) picked up Green Dot debit card ending in -6716 from an address on University Avenue in San Diego, and caused it to be delivered to defendant GRIGORIAN (1).

110. On May 24, 2011, defendant GRIGORIAN (1) caused a 2010 tax return to be filed with the IRS in the name of an identity theft victim with the initials F.V. The return fraudulently claimed an $8,610 tax refund.

111. On June 3, 2011, defendant GRIGORIAN (1) caused the Treasury to wire the fraudulently obtained $8,610 tax refund (based on the F.V. return) to Green Dot account ending in -3971 in the name of E.A.

112. On June 6, 2011, defendant GRIGORIAN (1) caused Green Dot debit card ending in -6716 to be delivered to defendants MELNIKOV (5) and TALANOV (8) so they could purchase money orders with money from the fraudulently obtained refund.

113. On June 7, 2011, defendants MELNIKOV (5) and TALANOV (8) purchased six, $500 money orders with Green Dot debit card ending in -6716 from a Walmart in San Diego.

114. On June 7, 2011, defendant GRIGORIAN (1) obtained the six, $500 money orders from defendants MELNIKOV (5) and TALANOV (8) at a meeting in San Diego.

F.H. Tax Return

115. On June 8, 2011, defendant GRIGORIAN (1) caused a 2010 tax return to be filed with the IRS in the name of an identity theft victim with the initials F.H. The return fraudulently claimed a $9,615 tax refund.

116. On June 24, 2011, defendant GRIGORIAN (1) caused the Treasury to mail the fraudulently obtained $9,615 tax refund check (no. ending -5037) in F.H.'s name to an address on El Cajon Boulevard in San Diego.

117. On June 29, 2011, two unknown coconspirators picked up mail at an address on El Cajon Boulevard in San Diego, which included the $9,615 Treasury check (no. ending -5037), payable to F.H., and provided it to defendant GRIGORIAN (1).

118. On July 6, 2011, defendant GRIGORIAN (1) caused the $9,615 Treasury check (no. ending -5037), payable to F.H., to be cashed at Joyro Check Cashing.

S.B. Tax Return

119. On June 28, 2011, defendant GRIGORIAN (1) caused a 2010 tax return to be filed (after being routed through Intuit's San Diego server) with the IRS in the name of an identity theft victim with the initials S.B. The return fraudulently claimed a $9,520 tax refund.

120. On July 15, 2011, defendant GRIGORIAN (1) caused the Treasury to mail the fraudulently obtained $9,520 tax refund check (no. ending -0119) in S.B.'s name to an address on Georgia Street in San Diego.

121. On August 22, 2011, defendant GRIGORIAN (1) caused the $9,520 tax refund check (no. ending -0119), payable to S.B., to be cashed.

M.E. Tax Return

122. On August 10, 2011, defendant GRIGORIAN (1) caused a 2010 tax return to be filed with the IRS in the name of an identity theft victim with the initials M.E. The return fraudulently claimed a $9,516 tax refund.

123. On August 12, 2011, defendant GRIGORIAN (1) called WFB to check the balance of defendant POLOZOVA's (23) WFB account ending in -8038 (in the name of an unindicted coconspirator).

124. On August 19, 2011, defendant GRIGORIAN (1) caused the Treasury to wire the fraudulently obtained $9,516 tax refund to defendant POLOZOVA's (23) WFB account ending in -8038.

125. On September 1, 2011, defendant POLOZOVA (23) caused $5,000 to be withdrawn from her WFB account ending in -8038. This was one of four branch withdrawals made from the account between August 29, 2011, and September 8, 2011 (totaling over $8,700 in withdrawals).

S.Ro. Tax Return

126. On August 12, 2011, defendant GRIGORIAN (1) called WFB to check the balance of WFB account ending in -3917, an account controlled by the defendants.

127. On August 26, 2011, defendant GRIGORIAN (1) caused a 2010 tax return to be filed with the IRS in the name of an identity theft victim with the initials S.Ro. The return fraudulently claimed a $9,149 tax refund.

128. On September 9, 2011, defendant GRIGORIAN (1) caused the Treasury to wire the fraudulently obtained $9,149 tax refund to WFB account ending in -3917.

129. On September 12, 2011, defendants GRIGORIAN (1) and I. AKHMETOVA (11) caused a $9,075 check (no. 95) from WFB account ending in -3917 to be deposited into defendant I. AKHMETOVA's (11) Chase account ending -9901. The check was

made payable to Bella Photography, a fictitious business in the name of defendant I. AKHMETOVA (11).

130. On September 13, 2011, defendant I. AKHMETOVA (11) withdrew $8,500 in cash from her Chase account ending in -9901.

M.S. Tax Return

131. On August 9, 2011, defendant SOLOIAN (2) caused a 2010 tax return to be filed with the IRS in the name of an identity theft victim with the initials M.S. The refund fraudulently claimed an $8,677 tax refund.

132. On August 19, 2011, defendant SOLOIAN (2) caused the Treasury to wire the fraudulently obtained $8,677 tax refund to defendant ZHURYN's (29) WFB account ending in -4375.

133. On August 19, 2011, defendants SOLOIAN (2) and ZHURYN (29) caused $8,600 to be transferred from his WFB account ending in -4375 to his WFB account ending in -3710, a linked account.

134. On August 19, 2011, defendant ZHURYN (29) caused an $8,500 check (no. 9001) from his WFB account ending in -3710 to be deposited into defendant LAZAREV's (18) BoA account ending in -5998.

135. On August 24, 2011, defendant SOLOIAN (2) instructed defendant LAZAREV (18) to withdraw $4,500 and to call him (defendant SOLOIAN (2)) when the transaction was completed.

136. On August 24, 2011, defendant LAZAREV (18) withdrew $4,500 in cash from his BoA account ending in -5998.

M.A. Tax Return

137. On August 15, 2011, defendant SOLOIAN (2) caused a 2010 tax return to be filed with the IRS in the name of an identity theft victim with the initials M.A. The return fraudulently claimed a $9,842 tax refund.

138. On August 26, 2011, defendant SOLOIAN (2) caused the Treasury to wire the fraudulently obtained $9,842 tax refund to an unindicted coconspirator's WFB account ending in -9700.

139. On August 26, 2011, defendant SOLOIAN (2) caused $9,650 to be transferred from the same unindicted coconspirator's WFB account ending in -9700 to WFB account ending in -5637, a linked account.

140. On August 26, 2011, defendants SOLOIAN (2) and LAZAREV (18) caused a $9,450 check (no. 102) from WFB account ending in -5637 to be deposited into LAZAREV's BoA account ending in -0889.

141. On September 7, 2011, defendant LAZAREV (18) withdrew $9,100 in cash from his BoA account ending in -0889 at a San Diego BoA branch.

142. On September 7, 2011, defendant LAZAREV (18) confirmed the $9,100 withdrawal with defendant SOLOIAN (2).

L.B. Tax Return

143. On May 20, 2011, defendant MUSAYEV (7) texted the PII of an unindicted coconspirator with the initials N.N. (who had been in the United States on a J1 visa but had departed), to a third party in order to facilitate the opening of bank accounts in N.N.'s name.

144. On May 20, 2011, defendant MIHAILESCU (6), an employee at WFB, opened two accounts, ending in -6147 and -0697, in N.N.'s name.

145. On June 28, 2011, defendants GRIGORIAN (1) and SOLOIAN (2) caused a 2010 tax return to be filed with the IRS in the name of an identity theft victim with the initials L.B. The return fraudulently claimed a $9,756 tax refund.

146. On July 8, 2011, defendants GRIGORIAN (1) and SOLOIAN (2) caused the Treasury to wire the $9,756 fraudulently obtained tax refund to the WFB account ending in -0697 opened up by defendant MIHAILESCU (6) in the name of N.N.

147. On July 9, 2011, defendants GRIGORIAN (1) and SOLOIAN (2) provided through a third party a $9,780 check (no. 96) from the N.N. WFB account ending in -0697

to defendant Y. IVANOV (17). The check was made payable to American Design, a fictitious business used by defendant Y. IVANOV to maintain BoA account ending in -6164.

148. On July 11, 2011, defendant Y. IVANOV (17) caused the $9,780 check (no. 96) to be deposited into his BoA account ending in -6164.

149. On July 15, 2011, defendant Y. IVANOV (17) withdrew $4,800 from his BoA account ending in -6164.

150. On July 18, 2011, defendant Y. IVANOV (17) withdrew $4,500 from his BoA account ending in -6164 at a BoA San Diego branch.

S.A. Tax Return

151. On July 12, 2011, defendant GRIGORIAN (1) caused a 2010 tax return to be filed with the IRS in the name of an identity theft victim with the initials S.A. The return fraudulently claimed a $9,726 tax refund.

152. On July 22, 2011, defendant GRIGORIAN (1) caused the Treasury to wire the fraudulently obtained $9,726 tax refund to WFB account ending in -6147 (the same account opened by defendant MIHAILESCU (6) as set forth in Overt Act ¶ 144).

153. On July 22, 2011, defendant GRIGORIAN (1) caused $9,750 to be transferred from the N.N. WFB account ending in -6147 to the N.N. WFB account ending in -0697 (both accounts opened by defendant MIHAILESCU (6) as set forth in Overt Act ¶ 144).

154. On July 25, 2011, defendant GRIGORIAN (1) provided through a third party a $9,810 check (no. 97) from the N.N. WFB account ending in -0697 to defendant I. AKHMETOVA (11) for deposit.

155. On July 25, 2011, defendant I. AKHMETOVA (11) caused the $9,810 check (no. 97) to be deposited into her BoA account ending in -6186.

156. On August 2, 2011, defendant I. AKHMETOVA (11) withdrew $9,000 from her BoA account ending in -6186 at a San Diego BoA branch. Defendant I.

AKHMETOVA kept $900 as payment for transferring and cashing the fraudulently obtained refund.

157. On August 3, 2011, defendant GRIGORIAN (1) obtained the remaining $8,100 at a meeting in San Diego.

G.S. Tax Return

158. On June 22, 2011, defendant GRIGORIAN (1) caused a 2010 tax return to be filed with the IRS in the name of an identity theft victim with the initials G.S. The return fraudulently claimed an $8,560 tax refund.

159. On July 29, 2011, defendant GRIGORIAN (1) caused the Treasury to wire the fraudulently obtained $8,495.10 tax refund to the N.N. WFB account ending in -6147 (the same account opened by defendant MIHAILESCU (6) as set forth in Overt Act ¶ 144).

160. On August 5, 2011, defendant GRIGORIAN (1) provided to a third party a handwritten note that stated, "[Name omitted] WF – 8,580 Yevgeniy I.," and a $8,580 check (no. 98) from the N.N. WFB account ending in -0697. Both were to be delivered to defendant Y. IVANOV (17) for deposit.

161. On August 6, 2011, defendant GRIGORIAN (1) caused $8,600 to be transferred from the N.N. WFB account ending in -6147 to the N.N. WFB account ending in -0697 (both accounts opened by defendant MIHAILESCU (6) as set forth in Overt Act ¶ 144).

162. On August 8, 2011, defendant Y. IVANOV (17) caused the $8,580 check (no. 98) to be deposited into his BoA account ending in -0907.

163. On August 11, 2011, defendant Y. IVANOV (17) withdrew $4,500 from his BoA account ending in -0907 at a San Diego BoA branch.

164. On August 15, 2011, defendant Y. IVANOV (17) withdrew $3,500 from his BoA account ending in -0907 at a San Diego BoA branch.

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M.J. and D.V. Tax Return

165. On May 28, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused a 2011 tax return to be filed with the IRS in the names of identity theft victims with the initials M.J. and D.V. The return fraudulently claimed an $8,602 tax refund.

166. On June 6, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused the Treasury to wire the fraudulently obtained $8,602 tax refund to defendant OMAROV's (21) Chase Bank account ending in -2573 (listed in the email account postings in Overt Acts ¶¶ 47-49).

167. On June 6, 2012, defendants SOLOIAN (2), HARUTYUNYAN (3), and others met and discussed, in explicit and coded language, various aspects of the conspiracy, including the fraudulently obtained $8,602 tax refund related to the M.J./D.V. tax return.

A.R. and S.R. Tax Return

168. On June 3, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused a 2011 tax return to be filed with the IRS in the names of identity theft victims with the initials A.R. and S.R. The return fraudulently claimed an $8,606 tax refund.

169. On June 13, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused the Treasury to wire the fraudulently obtained $8,606 tax refund to OMAROV's (21) Chase Bank account ending in -2573 (listed in the email account posting in Overt Act ¶ 47).

170. On June 13, 2012, defendant OMAROV (21) withdrew $6,000 from his Chase Bank account ending in -2573.

B.O. and M.G. Return

171. On June 12, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused a 2011 tax return to be filed with the IRS in the names of identity theft victims M.G. and B.O. (listed in the email account postings in Overt Acts ¶¶ 50 and 52). The return fraudulently claimed an $8,705 tax refund.

172. On June 13, 2012, defendant HARUTYUNYAN caused information to be posted to the Yahoo! account that provided, in part, the details of defendant K. IVANOV's (16) WFB account ending in -5455 (the same account listed in the email account postings in Overt Acts ¶¶ 47 and 51).

173. On June 18, 2012, an unindicted coconspirator caused information to be posted to the Yahoo! account that provided the details of the expected fraudulent B.O./M.G. tax refund as follows: "WF, 5455, $8705 (21.06)."

174. On June 22, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused the Treasury to wire the fraudulently obtained $4,696.40 tax refund to defendant K. IVANOV's (16) WFB account ending in -5455.

M.L. and B.Q. Return

175. On June 17, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused a 2011 tax return to be filed with the IRS in the names of identity theft victims M.L. and B.Q (listed in the email account posting in Overt Act ¶ 52). The return fraudulently claimed an $8,518 tax refund.

176. On June 28, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused the Treasury to wire the fraudulently obtained $8,518 tax refund to defendant OMAROV's (21) WFB account ending in -6313 (the same account listed in the email account posting in Overt Act ¶ 47).

M.P. and L.L. Return

177. On May 25, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused a 2011 tax return to be filed with the IRS in the names of identity theft victims with the initials M.P. and L.L. The return fraudulently claimed an $8,505 tax refund.

178. On June 6, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused the Treasury to wire the fraudulently obtained $8,505 tax refund to defendant OMAROV's (21) U.S. Bank account ending in -9142 (listed in the email account postings in Overt Acts ¶¶ 48-49).

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179. On June 11, 2012, defendant OMAROV (21) caused $7,500 to be transferred from his U.S. Bank account ending in -9142 to his U.S. Bank account ending in -5844.

M.R. and S.T. Return

180. On May 26, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused a 2011 tax return to be filed with the IRS in the names of identity theft victims with the initials M.R. and S.T. The return fraudulently claimed an $8,867 tax refund.

181. On June 6, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused the Treasury to wire the fraudulently obtained $7,497.66 tax refund to defendant OMAROV's (21) U.S. Bank account ending in -5844 (listed in the email account postings in Overt Acts ¶¶ 48-49).

I.H. and M.M.R. Return

182. On June 9, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused a 2011 tax return to be filed with the IRS in the names of identity theft victims with the initials M.M.R. and I.H. (I.H. being listed in the email account posting in Overt Act ¶ 50). The return fraudulently claimed an $8,486 tax refund.

183. On June 20, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused the Treasury to wire the fraudulently obtained $8,486 tax refund to defendant OMAROV's (21) U.S. Bank account ending in -9142.

L.O. and R.P. Return

184. On June 10, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused a 2011 tax return to be filed with the IRS in the names of identity theft victims L.O. and R.P. (listed in the email account posting in Overt Act ¶ 50). The return fraudulently claimed an $8,890 tax refund.

185. On June 20, 2012, defendants SOLOIAN (2) and HARUTYUNYAN (3) caused the Treasury to wire the fraudulently obtained $8,890 tax refund to defendant OMAROV's (21) U.S. Bank account ending in -5844.

Other Use of Bank Accounts to Receive Fraudulent Tax Refunds and Launder Money

186. On August 5, 2011, defendants GRIGORIAN (1) and SOLOIAN (2) caused the Treasury to wire a fraudulently obtained $8,372 tax refund (based on a tax return in the name of an identity theft victim with the initials J.C.) to defendant POLOZOVA's (23) WFB account ending in -0232.

187. On August 8, 2011, defendant POLOZOVA (23) caused $8,250 to be transferred from her WFB account ending in -0232 to her WFB account ending in -8971.

188. On August 8, 2011, defendant POLOZOVA (23) caused an $8,100 check (no. 95) from her WFB account ending in -8971 to be deposited into defendant P. MAGALIYEVA's (20) Chase bank account ending in -3880.

189. On August 19, 2011, defendants GRIGORIAN (1) and SOLOIAN (2) caused the Treasury to wire a fraudulently obtained $9,492 tax refund (based on a tax return in the name of an identity theft victim with the initials C.M.) to defendant M. AKHMETOVA's (12) Chase account ending in -7747.

190. On August 25, 2011, defendant M. AKHMETOVA (12) caused a $9,200 check (no. 103) from her Chase account ending in -7747 to be deposited into defendant SHILIKBAY's (24) Chase Bank account ending in -9384.

191. On August 31, 2011, defendant SHILIKBAY (24) withdrew $4,800 from his Chase Bank account ending in -9384.

192. On April 20, 2012, defendants GRIGORIAN (1) and SOLOIAN (2) caused the Treasury to wire a fraudulently obtained $9,221 tax refund (based on a fraudulent tax return filed in the name of identity theft victims with the initials G.S. and M.S.) to defendant TSOY's (27) Chase Bank account ending in -5091.

193. On April 20, 2012, defendant TSOY (27) withdrew $9,000 from his Chase Bank account ending in -5091.

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Additional Cashing of Fraudulent Tax Refund Checks

194. In October 2011, defendant SOLOIAN (2) cashed a fraudulently obtained $9,684 Treasury check (no. ending -6841), payable to an identity theft victim with the initials L.P.

195. In October 2011, defendant SOLOIAN (2) cashed a fraudulently obtained $9,749 Treasury check (no. ending -8248), payable to an identity theft victim with the initials J.A.

Additional Phone Conversations and Text Messages in Furtherance of Conspiracy

196. On August 17, 2011, defendant K. MAGALIYEV (19) spoke on the phone with defendant GRIGORIAN (1) about renting apartments, which GRIGORIAN stated they needed urgently. GRIGORIAN also stated that he would make an identification document for K. MAGALIYEV so that he will earn more money.

197. On August 22, 2011, defendant GRIGORIAN (1) spoke on the phone with defendant SOLOIAN (2) about the purchase of stolen identities from defendant HARUTYUNYAN (3).

198. On August 25, 2011, defendant SOLOIAN (2) told defendant GRIGORIAN (3) on the phone, among other things, that he was going to get candies [stolen identities] from Cobra [defendant HARUNTUNYAN (3)].

199. On September 22, 2011, defendant GRIGORIAN (1) threatened defendant SHILIKBAY (24) in text messages that said in substance, among other things, the following: (a) If you are not going to answer now, I'm going to fuck you up; (b) You will not get your passport back; (c) I have warned you; and (d) You are a dead body.

200. On September 23, 2011, defendant BATCHAEV (13) spoke on the phone with defendant GRIGORIAN (1) about checking mail, telling GRIGORIAN, among other things, that he had finished, that he picked up a couple presents [tax refunds], and that he would give the presents to GRIGORIAN when he arrived.

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Additional Meetings and Conversations in Furtherance of the Conspiracy

201. On May 11, 2011, defendant GEVORGYAN (4) spoke with a third party about tax refund money, checks, and bank accounts.

202. On May 25, 2011, defendant MUSAYEV (7) spoke with defendants M. AKHMETOVA (12), OSPANOVA (22), and a third party about bank accounts, withdrawing money, and making deposits.

203. On June 14, 2011, defendant GEVORGYAN (4) spoke with a third party about picking up new "Joriks" [J1/F1s] and how much to pay them. GEVORGYAN also asked for their names.

All in violation of Title 18, United States Code, Section 371.

Counts 2 Through 8

MAIL FRAUD

(18 U.S.C. § 1341)

204. The Grand Jury hereby realleges, and incorporates by reference paragraphs 1 through 13 of this Indictment as if fully set forth herein.

A. Scheme to Defraud

205. Beginning on a date unknown to the Grand Jury, but as early as in or about March 2011, and continuing through at least November 2012, within the Southern District of California, and elsewhere, defendants ARTHUR GRIGORIAN (1), aka Artur, aka Kor, aka Mo, aka Ponch, aka Ponchik, aka Chagh, ERNEST SOLOIAN (2), aka Erik, STANSILAV MELNIKOV (5), aka Stas, and RENAT TALANOV (8), together with each other and others, knowingly and with the intent to defraud, devised and executed a scheme to defraud as to material matters, and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

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B. Means to Accomplish the Scheme to Defraud

206. The Grand Jury hereby repeats, realleges, and incorporates by reference paragraphs 16 through 31 of this Indictment as if fully set forth herein.

C. Use of the Mails

207. On or about the dates set forth below, within the Southern District of California, and elsewhere, the following defendants, for the purpose of executing and attempting to execute the above-described scheme to defraud, knowingly caused to be delivered by mail, according to the direction thereon, the following items:

COUNT	DEFENDANT(S)	DATE	ITEM MAILED
2	GRIGORIAN (1) SOLOIAN (2) TALANOV (8)	4/25/11	Green Dot card -6716, in the name of an identity theft victim with the initials E.A., mailed to an address on University Avenue in San Diego
3	GRIGORIAN (1) SOLOIAN (2) MELNIKOV (5)	4/29/11	Green Dot card -1805, in the name of an identity theft victim with the initials C.D., mailed to an address on University Avenue in San Diego
4	GRIGORIAN (1) SOLOIAN (2)	5/20/11	U.S. Treasury check (no. ending -2166) in the amount of $8,946 and in the name of an identity theft victim with the initials I.R., mailed to an address on University Avenue in San Diego
5	GRIGORIAN (1) SOLOIAN (2)	5/20/11	U.S. Treasury check (no. ending -2139) in the amount of $9,502 and in the name of an identity theft victim with the initials C.R., mailed to an address on University Avenue in San Diego
6	GRIGORIAN (1) SOLOIAN (2)	6/10/11	U.S. Treasury check (no. ending -5473) in the amount of $9,709 and in the name of an identity theft victim with the initials B.R., mailed to an address on University Avenue in San Diego

7	GRIGORIAN (1) SOLOIAN (2)	6/24/11	U.S. Treasury check (no. ending -5037) in the amount of $9,615 and in the name of an identity theft victim with the initials F.H., mailed to an address on El Cajon Boulevard in San Diego
8	GRIGORIAN (1) SOLOIAN (2)	7/15/11	U.S. Treasury check (no. ending -0119) in the amount of $9,520 and in the name of an identity theft victim with the initials S.B., mailed to an address on Georgia Street in San Diego

All in violation of Title 18, United States Code, Section 1341.

Counts 9 Through 19

WIRE FRAUD

(18 U.S.C. § 1343)

208. The Grand Jury hereby realleges, and incorporates by reference paragraphs 1 through 13 of this Indictment as if fully set forth herein.

A. Scheme to Defraud

209. Beginning on a date unknown to the Grand Jury, but as early as in or about March 2011, and continuing through at least November 2012, within the Southern District of California, and elsewhere, defendants ARTHUR GRIGORIAN (1), aka Artur, aka Kor, aka Mo, aka Ponch, aka Ponchik, aka Chagh, ERNEST SOLOIAN (2), aka Erik, HOVHANNES HARUTYUNYAN (3), aka Hovo, aka Anaconda, aka Snake, aka Cobra, aka Oz, STANSILAV MELNIKOV (5), aka Stas, RENAT TALANOV (8), together with each other and others, knowingly and with the intent to defraud, devised and executed a scheme to defraud as to material matters, and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

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B. Means to Accomplish the Scheme to Defraud

210. The Grand Jury hereby repeats, realleges, and incorporates by reference paragraphs 16 through 31 of this Indictment as if fully set forth herein.

C. Use of the Wires

211. On or about the dates set forth below, within the Southern District of California, and elsewhere, the following defendants, for the purpose of executing and attempting to execute the above-described scheme to defraud, caused to be transmitted by means of wire communication in interstate commerce the signals described below:

COUNT	DEFENDANTS	DATE	THE WIRE
9	GRIGORIAN (1) SOLOIAN (2) MELNIKOV (5)	5/13/11	A direct deposit of a tax refund in the amount of $6,899 to Green Dot account -5600 (linked to Green Dot card -1805) in the name of an identity theft victim with the initials C.D.
10	GRIGORIAN (1) SOLOIAN (2) TALANOV (8)	6/3/11	A direct deposit of a tax refund in the amount of $8,610 to Green Dot account -3971 (linked to Green Dot card -6716) in the name of an identity theft victim with the initials E.A.
11	GRIGORIAN (1) SOLOIAN (2) TALANOV (8)	7/5/11	A direct deposit of a tax refund in the amount of $9,800 to TALANOV's Citibank account -6420
12	SOLOIAN (2) HARUTYUNYAN (3)	6/6/12	A direct deposit of a tax refund in the amount of $8,602 to OMAROV's Chase Bank account -2573
13	SOLOIAN (2) HARUTYUNYAN (3)	6/6/12	A direct deposit of a tax refund in the amount of $8,505 to OMAROV's U.S. Bank account -9142
14	SOLOIAN (2) HARUTYUNYAN (3)	6/6/12	A direct deposit of a tax refund in the amount of $7,497.66 to OMAROV's U.S. Bank account -5844

15	SOLOIAN (2) HARUTYUNYAN (3)	6/13/12	A direct deposit of a tax refund in the amount of $8,606 to OMAROV's Chase Bank account -2573
16	SOLOIAN (2) HARUTYUNYAN (3)	6/20/12	A direct deposit of a tax refund in the amount of $8,486 to OMAROV's U.S. Bank account -9142
17	SOLOIAN (2) HARUTYUNYAN (3)	6/20/12	A direct deposit of a tax refund in the amount of $8,890 to OMAROV's U.S. Bank account -5844
18	SOLOIAN (2) HARUTYUNYAN (3)	6/22/12	A direct deposit of a tax refund in the amount of $4,696.40 to K. IVANOV's WFB account -5455
19	SOLOIAN (2) HARUTYUNYAN (3)	6/28/12	A direct deposit of a tax refund in the amount of $8,518 to OMAROV's WFB account -6313

All in violation of Title 18, United States Code, Section 1343.

Counts 20 Through 49

MONEY LAUNDERING

(18 U.S.C. § 1956(a)(1)(B)(i))

212. The Grand Jury hereby realleges, and incorporates by reference paragraphs 1 through 13 of this Indictment as if fully set forth herein.

213. On or about the dates set forth below, within the Southern District of California and elsewhere, defendants ARTHUR GRIGORIAN (1), aka Artur, aka Kor, aka Mo, aka Ponch, aka Ponchik, aka Chagh, ERNEST SOLOIAN (2), aka Erik, HOVHANNES HARUTYUNYAN (3), aka Hovo, aka Anaconda, aka Snake, aka Cobra, aka Oz, STANSILAV MELNIKOV (5), aka Stas, RENAT TALANOV (8), MERUYERT AKHMETOVA (12), aka Mira, aka Tall One, YERMEK DOSSYMBEKOV (15), VYACHESLAV LAZAREV (18), ALISHER OMAROV (21), aka Aisher, MADLEN OSPANOVA (22), and VYACHESLAV TSOY (27), aka Kachal, aka Slava, knowing that the property involved in financial transactions affecting interstate commerce represented

the proceeds of some form of unlawful activity, knowingly conducted, and attempted to conduct, financial transactions affecting interstate and foreign commerce which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that such financial transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity:

COUNT	DEFENDANTS	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
20	GRIGORIAN (1) SOLOIAN (2) M. AKHMETOVA (12)	5/16/11	Deposit of check (no. 153) in the amount of $9,700 from WFB account -7279, into M. AKHMETOVA's Chase Bank account -7747	18 U.S.C. § 1343
21	GRIGORIAN (1) SOLOIAN (2) TALANOV (8)	5/16/11	Deposit of check (no. 105) in the amount of $9,650 from WFB account -8890, into TALANOV's Chase Bank account -7457	18 U.S.C. § 1343
22	GRIGORIAN (1) SOLOIAN (2) M. AKHMETOVA (12)	5/16/11	Deposit of check (no. 105) in the amount of $9,850 from WFB account -0745, into M., AKHMETOVA's BoA account -7631	18 U.S.C. § 1343
23	GRIGORIAN (1) SOLOIAN (2) OSPANOVA (22)	5/23/11	Deposit of check (no. 1054) in the amount of $9,200 from Chase Bank account -9906, into OSPANOVA's BoA account -8395	18 U.S.C. § 1343

24	GRIGORIAN (1) SOLOIAN (2) M. AKHMETOVA (12)	5/25/11	Deposit of check (no. 104) in the amount of $4,600, from Citibank account -2764, into M. AKHMETOVA's U.S. Bank account -2768	18 U.S.C. § 1343
25	GRIGORIAN (1) SOLOIAN (2) OSPANOVA (22)	5/25/11	Deposit of check (no. 105) in the amount of $6,500, from Citibank account -2764, into OSPANOVA's U.S. Bank account -2735	18 U.S.C. § 1343
26	GRIGORIAN (1) SOLOIAN (2) M. AKHMETOVA (12)	5/25/11	Withdrawal of $9,000 cash from M. AKHMETOVA's Chase Bank account -7747	18 U.S.C. § 1343
27	GRIGORIAN (1) SOLOIAN (2) M. AKHMETOVA (12)	5/25/11	Withdrawal of $9,000 cash from M. AKHMETOVA's BoA account -7631	18 U.S.C. § 1343
28	GRIGORIAN (1) SOLOIAN (2) OSPANOVA (22)	5/25/11	Withdrawal of $5,000 cash from OSPANOVA's BoA account -8395	18 U.S.C. § 1343
29	GRIGORIAN (1) SOLOIAN (2) TALANOV (8)	5/25/11	Withdrawal of $8,900 cash from TALANOV's Chase Bank account -7457	18 U.S.C. § 1343
30	GRIGORIAN (1) SOLOIAN (2)	5/26/11	GRIGORIAN's receipt of approximately $30,700 cash withdrawn from bank accounts held by OSPANOVA, M. AKHMETOVA, and TALANOV	18 U.S.C. § 1343

31	GRIGORIAN (1) SOLOIAN (2) M. AKHMETOVA (12)	5/31/11	Deposit of check (no. 106) in the amount of $7,000, from WFB account -8890, into M. AKHMETOVA's Citibank account -6959	18 U.S.C. § 1343
32	GRIGORIAN (1) SOLOIAN (2) M. AKHMETOVA (12)	6/7/11	Withdrawal of $7,000 cash from M. AKHMETOVA's Citibank account -6959	18 U.S.C. § 1343
33	GRIGORIAN (1) SOLOIAN (2) M. AKHMETOVA (12)	6/7/11	Withdrawal of $4,600 cash from M. AKHMETOVA's U.S. Bank account -2768	18 U.S.C. § 1343
34	GRIGORIAN (1) SOLOIAN (2) OSPANOVA (22)	6/7/11	Withdrawal of $6,400 cash from OSPANOVA's U.S. Bank account -2735	18 U.S.C. § 1343
35	GRIGORIAN (1) SOLOIAN (2) MELNIKOV (5) TALANOV (8)	6/7/11	Purchase of $500.60 money order with funds on Green Dot card - 6716	18 U.S.C. § 1343
36	GRIGORIAN (1) SOLOIAN (2) MELNIKOV (5) TALANOV (8)	6/7/11	Purchase of $500.60 money order with funds on Green Dot card - 6716	18 U.S.C. § 1343
37	GRIGORIAN (1) SOLOIAN (2) MELNIKOV (5) TALANOV (8)	6/7/11	Purchase of $500.60 money order with funds on Green Dot card - 6716	18 U.S.C. § 1343

38	GRIGORIAN (1) SOLOIAN (2) MELNIKOV (5) TALANOV (8)	6/7/11	Purchase of $500.60 money order with funds on Green Dot card - 6716	18 U.S.C. § 1343
39	GRIGORIAN (1) SOLOIAN (2) MELNIKOV (5) TALANOV (8)	6/7/11	Purchase of $500.60 money order with funds on Green Dot card - 6716	18 U.S.C. § 1343
40	GRIGORIAN (1) SOLOIAN (2) MELNIKOV (5) TALANOV (8)	6/7/11	Purchase of $500.60 money order with funds on Green Dot card - 6716	18 U.S.C. § 1343
41	GRIGORIAN (1) SOLOIAN (2) LAZAREV (18)	9/7/11	Withdrawal of $9,100 cash from LAZAREV's BoA account -0889	18 U.S.C. § 1343
42	GRIGORIAN (1) SOLOIAN (2) TSOY (27)	2/2/12	Transfer of $7,500 from TSOY's U.S. Bank account -6694 to his U.S. Bank account - 3309	18 U.S.C. § 1343
43	GRIGORIAN (1) SOLOIAN (2) TSOY (27)	2/3/12	Withdrawal of $400 cash from TSOY's U.S. Bank account -6694	18 U.S.C. § 1343
44	GRIGORIAN (1) SOLOIAN (2) TSOY (27)	5/7/12	Withdrawal of $500 cash from TSOY's Chase account -5091	18 U.S.C. § 1343
45	GRIGORIAN (1) SOLOIAN (2) DOSSYMBEKOV (15)	5/31/12	Withdrawal of $500 cash from DOSSYMBEKOV's Chase account -4429	18 U.S.C. § 1343

46	SOLOIAN (2) HARUTYUNYAN (3) OMAROV (21)	6/8/12	Withdrawal of $8,000 cash from OMAROV's Chase Bank account -2573	18 U.S.C. § 1343
47	SOLOIAN (2) HARUTYUNYAN (3) OMAROV (21)	6/11/12	Transfer of $7,500 from OMAROV's U.S. Bank account -9142 to his U.S. Bank account -5844	18 U.S.C. § 1343
48	SOLOIAN (2) HARUTYUNYAN (3) OMAROV (21)	6/13/12	Withdrawal of $6,000 cash from OMAROV's Chase Bank account -2573	18 U.S.C. § 1343
49	SOLOIAN (2) HARUTYUNYAN (3) DOSSYMBEKOV (15)	6/29/12	Withdrawal of $500 cash from DOSSYMBEKOV's Chase account -4429	18 U.S.C. § 1343

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Counts 50 Through 74

AGGRAVATED IDENTITY THEFT

(18 U.S.C. § 1028A)

214. The Grand Jury hereby realleges, and incorporates by reference paragraphs 1 through 13 of this Indictment as if fully set forth herein.

215. On or about the dates set forth below, within the Southern District of California and elsewhere, defendants ARTHUR GRIGORIAN (1), aka Artur, aka Kor, aka Mo, aka Ponch, aka Ponchik, aka Chagh, ERNEST SOLOIAN (2), aka Erik, HOVHANNES HARUTYUNYAN (3), aka Hovo, aka Anaconda, aka Snake, aka Cobra, aka Oz, and HAROUT GEVORGYAN (4), aka Noro, knowingly transferred, possessed, and used, and caused to be transferred, possessed, and used, without lawful authority, a

means of identification of another person, that is, the name and Social Security number of another person (listed below by initials only), knowing that the means of identification belonged to another person, during and in relation to: (a) a felony violation of Title 18, United States Code, Section 1341, mail fraud; (b) a felony violation of Title 18, United States Code, Section 1343, wire fraud; and (c) a felony violation of Title 18, United States Code, Section 1349, conspiracy to commit mail and wire fraud (as listed below):

COUNT	DEFENDANTS	DATE	INDIVIDUAL	PREDICATE FELONY
50	GRIGORIAN (1) SOLOIAN (2) GEVORGYAN (4)	February and March 2011	E.A.E.	18 U.S.C. § 1349
51	GRIGORIAN (1) SOLOIAN (2) GEVORGYAN (4)	March 2011	C.A.	18 U.S.C. §§ 1343 and 1349
52	GRIGORIAN (1) SOLOIAN (2) GEVORGYAN (4)	March 2011	M.F.	18 U.S.C. §§ 1343 and 1349
53	GRIGORIAN (1) SOLOIAN (2) GEVORGYAN (4)	March and April 2011	F.M.	18 U.S.C. § 1349
54	GRIGORIAN (1) SOLOIAN (2) GEVORGYAN (4)	March and April 2011	S.A.	18 U.S.C. §§ 1343 and 1349
55	GRIGORIAN (1) SOLOIAN (2) GEVORGYAN (4)	May 2011	A.M.	18 U.S.C. § 1349
56	GRIGORIAN (1) SOLOIAN (2)	May and June 2011	B.R.	18 U.S.C. §§ 1341, 1343, and 1349
57	GRIGORIAN (1) SOLOIAN (2)	May 2011	C.D.	18 U.S.C. §§ 1341, 1343, 1349
58	GRIGORIAN (1) SOLOIAN (2)	May 2011	C.R.	18 U.S.C. §§ 1341 and 1349
59	GRIGORIAN (1) SOLOIAN (2)	May 2011	I.R.	18 U.S.C. §§ 1341, 1343, and 1349
60	GRIGORIAN (1) SOLOIAN (2)	April and May 2011	J.S.	18 U.S.C. §§ 1341, 1343, and 1349

61	GRIGORIAN (1) SOLOIAN (2)	May 2011	M.Q.	18 U.S.C. §§ 1343 and 1349
62	GRIGORIAN (1) SOLOIAN (2)	May 2011	S.R.	18 U.S.C. §§ 1343 and 1349
63	GRIGORIAN (1) SOLOIAN (2)	June 2011	F.H.	18 U.S.C. §§ 1341 and 1349
64	GRIGORIAN (1) SOLOIAN (2)	June and July 2011	S.B.	18 U.S.C. §§ 1341, 1343, and 1349
65	GRIGORIAN (1) SOLOIAN (2)	June and July 2011	S.T.	18 U.S.C. §§ 1343 and 1349
66	GRIGORIAN (1) SOLOIAN (2) HARUTYUNYAN (3)	August and September 2011	M.A.	18 U.S.C. § 1349
67	GRIGORIAN (1) SOLOIAN (2) HARUTYUNYAN (3)	April 2011	E.W.	18 U.S.C. § 1349
68	SOLOIAN (2) HARUTYUNYAN (3)	June 2012	B.O.	18 U.S.C. §§ 1343 and 1349
69	SOLOIAN (2) HARUTYUNYAN (3)	June 2012	I.H.	18 U.S.C. §§ 1343 and 1349
70	SOLOIAN (2) HARUTYUNYAN (3)	June 2012	L.O.	18 U.S.C. §§ 1343 and 1349
71	SOLOIAN (2) HARUTYUNYAN (3)	June 2012	M.G.	18 U.S.C. §§ 1343 and 1349
72	SOLOIAN (2) HARUTYUNYAN (3)	June 2012	M.L.	18 U.S.C. §§ 1343 and 1349
73	SOLOIAN (2) HARUTYUNYAN (3)	June 2012	B.Q.	18 U.S.C. §§ 1343 and 1349
74	SOLOIAN (2) HARUTYUNYAN (3)	June 2012	R.P.	18 U.S.C. §§ 1343 and 1349

All in violation of Title 18, United States Code, Section 1028A.

CRIMINAL FORFEITURE ALLEGATIONS

216. The allegations contained in paragraphs 1 through 13 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(A), 981(a)(1)(C), 982(a)(1), 1028(b), and Title 28, United States Code, Section 2461(c).

217. Upon conviction of conspiracy to violate Title 18, United States Code, Sections 1341, 1343, and 1956, in violation of Title 18, United States Code, Section 371, as set forth in Count 1, defendants ARTHUR GRIGORIAN, aka Artur, aka Kor, aka Mo, aka Ponch, aka Ponchik, aka Chagh, ERNEST SOLOIAN, aka Erik, HOVHANNES HARUTYUNYAN, aka Hovo, aka Anaconda, aka Snake, aka Cobra, aka Oz, HAROUT GEVORGYAN, aka Noro, SUKHROB MUSAYEV, aka Suxrob, STANSILAV MELNIKOV, aka Stas, RENAT TALANOV, YVONNE MIHAILESCU, aka Blondie, MADLEN OSPANOVA, MERUYERT AKHMETOVA, aka Mira, aka Tall One, INDIRA AKHMETOVA, VYACHESLAV LAZAREV, YEVGENIY IVANOV, KARINA POLOZOVA, ZHASSULAN SHILIKBAY, aka Jasik, aka Tall One, SAGIT BATCHAEV, aka Chechen, PATIMAT MAGALIYEV, aka Fatima, KURBAN MAGALIYEV, ILYAS ABDRAKHAY, YERMEK DOSSYMBEKOV, VYACHESLAV TSOY, aka Kachal, aka Slava, KONSTANTIN IVANOV, NURBEK AKHMADIYEV, and ALISHER OMAROV, aka Aisher, shall forfeit to the United States, (a) any real or personal property constituting, derived from, or traceable to proceeds that the defendants obtained directly or indirectly as a result of the offense; and (b) any real or personal property involved in a money laundering transaction or attempted money laundering transaction, or any property traceable to such property.

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218. Upon conviction of mail fraud, in violation of Title 18, United States Code, Sections 1341, as set forth in Counts 2 through 8, defendants ARTHUR GRIGORIAN, aka Artur, aka Kor, aka Mo, aka Ponch, aka Ponchik, aka Chagh, ERNEST SOLOIAN, aka Erik, STANSILAV MELNIKOV, aka Stas, and RENAT TALANOV, shall forfeit to the United States, any real or personal property constituting, derived from, or traceable to proceeds that the defendants obtained directly or indirectly as a result of the offense.

219. Upon conviction of wire fraud, in violation of Title 18, United States Code, Sections 1343, as set forth in Counts 9 through 19, defendants ARTHUR GRIGORIAN, aka Artur, aka Kor, aka Mo, aka Ponch, aka Ponchik, aka Chagh, ERNEST SOLOIAN, aka Erik, HOVHANNES HARUTYUNYAN, aka Hovo, aka Anaconda, aka Snake, aka Cobra, aka Oz, STANSILAV MELNIKOV, aka Stas, RENAT TALANOV, KONSTANTIN IVANOV, and ALISHER OMAROV, shall forfeit to the United States, any real or personal property constituting, derived from, or traceable to proceeds that the defendants obtained directly or indirectly as a result of the offense.

220. Upon conviction of aggravated identity theft, in violation of Title 18, United States Code, Section 1028A, as set forth in Counts 50 through 74, defendants ARTHUR GRIGORIAN, aka Artur, aka Kor, aka Mo, aka Ponch, aka Ponchik, aka Chagh, ERNEST SOLOIAN, aka Erik, HOVHANNES HARUTYUNYAN, aka Hovo, aka Anaconda, aka Snake, aka Cobra, aka Oz, HAROUT GEVORGYAN, aka Noro, shall forfeit to the United States, any personal property used or intended to be used to commit the offense, pursuant to Title 18, United States Code, Section 1028(b).

221. If any of the property described above, as a result of any act or omission of defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty,

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it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), made applicable herein by Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendant up to the value of the said property described above as being subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(A), 981(a)(1)(C), 982(a)(1), and Title 28, United States Code, Section 2461(c).

DATED: September 19, 2013.

A TRUE BILL:

Foreperson

LAURA E. DUFFY
United States Attorney

By: PETER J. MAZZA
JOSEPH S. GREEN
Assistant U.S. Attorneys
TIMOTHY J. STOCKWELL
Special Assistant U.S. Attorney